EXHIBIT B

Issued by the
UNITED STATES DISTRICT COURT

DISTRICT OF Delaware

Invamed, Inc.,

Plaintiff,

V.

Barr Laboratories, Inc., Brantford Chemicals Inc., Bernard C. Sherman, Apotex Holdings, Inc., Apotex, Inc., and Sherman Delaware, Inc.,

Defendants.

SUBPOENA IN A CIVIL CASE

CASE NUMBER:[1] 98 Civ. 0861 (RWS)
(Pending in the Southern District of New York)

TO: E.I. DuPont De Nemours & Co.
DuPont Building, Room 8042
1007 Market St.
Wilmington, DE 19898

☐ YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

☒ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE AND TIME
Morris, Nichols, Arsht & Tunnel 1201 North Market Street, Wilmington, DE 19899-1347	October 13, 1999 10:00 a.m.

☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

SEE ATTACHED RIDER

PLACE	DATE AND TIME
Morris, Nichols, Arsht & Tunnel 1201 North Market Street, Wilmington, DE 19899-1347	October 8, 1999 10:00 a.m.

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons to consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)	DATE
Attorney for Defendant Brantford Chemicals Inc.	September 17, 1999

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER
John F. Kloecker, Lord, Bissell & Brook, 115 South LaSalle Street, Chicago, IL 60603
(312) 443-0235

(See Rule 45, Federal Rules of Civil Procedure Parts C & D on Reverse)

[1] If action is pending in district other than district of issuance, state district under case number.

RIDER

I. DEFINITIONS

1. "Invamed" means Invamed, Inc.; its present and former affiliates, officers, directors, employees and agents.

2. "Pharmaceutical warfarin sodium" means any branded or generic pharmaceutical product (e.g. Coumadin©) in tablet form which contains the chemical compound warfarin sodium as an active drug substance.

3. "Bulk warfarin sodium" means the chemical compound warfarin sodium and/or clathrate intended for use in the production of pharmaceutical warfarin sodium.

4. The terms "you" and "your" mean the natural persons and business, legal or governmental entities or associations responding to this document request.

5. "DuPont" means E.I. du Pont de Nemours & Co. and any of its present and former affiliates, subsidiaries and divisions involved in the development, manufacture, acquisition or sale of bulk warfarin sodium or pharmaceutical warfarin sodium (including but not limited to DuPont Chemoswed, DuPont Pharmaceutical Co., The DuPont Merck Pharmaceutical Co., DuPont Scandinavia and DuPont Specialty Chemicals).

II. RELEVANT PERIOD

1. Unless other specified, this Subpoena calls for testimony relating to the period January 1, 1993 through the present.

2. Unless other specified, this Subpoena calls for documents generated during, or containing information relating to, the period January 1, 1993 through the present.

III. NOTICE OF DEPOSITION PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 30(B)(6).

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Defendant Brantford Chemicals Inc. will take the deposition of DuPont commencing on October 13, 1999 at 10:00 a.m., and continuing daily until completed. The deposition will be conducted at the offices of Morris, Nichols, Arsht & Tunnell, 1201 North Market Street, Wilmington, DE 19899, or at such other location as agreed upon by the parties.

DuPont is requested to designate one or more individuals to testify on its behalf who have knowledge of:

1. The date DuPont acquired the bulk warfarin sodium operation of Chemoswed AB;
2. Chemoswed AB's supply of bulk warfarin sodium to other persons;
3. Whether Chemoswed AB transferred its Drug Master File to DuPont and the date of that transfer;
4. The date DuPont first manufactured bulk warfarin sodium;
5. DuPont's supply of bulk warfarin sodium to other persons;
6. The volume of bulk warfarin sodium manufactured by Chemoswed AB for each year during the relevant period;
7. The volume of bulk warfarin sodium manufactured by DuPont for each year during the relevant period;
8. Whether bulk warfarin sodium manufactured by Chemoswed AB during the relevant period conformed to the United States Pharmocopeia XXIII and the United States Food and Drug Administration (hereinafter "FDA") Good Manufacturing Practices.

9. Whether bulk warfarin sodium manufactured by DuPont during the relevant period conformed to the United States Pharmocopeia XXIII and FDA Good Manufacturing Practices.

IV. DOCUMENT REQUESTS.

A. Instructions

1. You are requested to produce the originals of all documents called for herein, as well as any and all copies of documents which bear any mark or notation not present on the original.

2. You are requested to produce in redacted form documents which contain information subject to a privilege but which also contain non-privileged information responsive to these document requests.

B. Documents Requested

1. All contracts or agreements relating to the development, manufacture or acquisition of bulk warfarin sodium.

2. Documents sufficient to show (a) the identity of the supplier(s) or manufacturer(s) of bulk warfarin sodium acquired by DuPont and (b) the volume of bulk warfarin sodium acquired from each supplier or manufacturer for each year during the relevant period.

3. Documents sufficient to show (a) the identity of the persons or companies which acquired bulk warfarin sodium from DuPont and (b) the volume of bulk warfarin sodium acquired by each person or company for each year during the relevant period.

4. All documents referring or relating to the actual or potential sale of bulk warfarin sodium by Chemoswed AB.

5. Documents sufficient to show the date of DuPont's acquisition of the bulk warfarin sodium operation of Chemoswed, the identity of the person or company which made the acquisition

and the identity of the person or company which presently owns the stock or assets acquired from Chemoswed.

6. All documents referring or relating to the actual or potential acquisition of bulk warfarin sodium by Invamed.

7. All documents referring or relating to the actual or potential development, marketing, distribution or manufacture of bulk warfarin sodium by any person or company other than DuPont.

8. All documents constituting, referring or relating to your communications with any actual or potential manufacturer, supplier, broker, distributor or marketer of bulk warfarin sodium. This request does not call for internal communications between divisions, subsidiaries or joint ventures of DuPont relating to bulk warfarin sodium manufactured by DuPont.

9 All documents referring or relating to the actual or potential supply of bulk warfarin sodium by DuPont to any person or company (other than to another subsidiary, division or joint venture of DuPont) for actual or potential use in pharmaceutical warfarin sodium to be sold in the United States.

10. All documents constituting, referring or relating to any actual or potential Drug Master File Authorizations or "Letters of Access" to FDA regarding bulk warfarin sodium or pharmaceutical warfarin sodium.

11. All documents constituting, referring or relating to any actual or potential Drug Master File submitted or to be submitted to the FDA for bulk warfarin sodium by any person or company other than Chemoswed A.B.